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**Exhibit A**

Proposed Order

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
Telephone: 628.208.6434  
Facsimile: 310.820.8859  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Boulevard  
Suite 1400  
Los Angeles, CA 90025  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**ORDER GRANTING MOTION TO  
COMPEL PG&E PRODUCTION OF  
BUSINESS PLANS**

1  
2 Upon the Motion dated August 16, 2019 (the “**Motion**”)<sup>1</sup> of the Official Committee of  
3 Tort Claimants (the “**TCC**”) to Compel Production of PG&E Business Plans (as defined in the  
4 Motion) pursuant to Rule 7037 of the Federal Rules of Bankruptcy Procedure, Rule 37 of the  
5 Federal Rule of Civil Procedure, and Rule 7037 of the Bankruptcy Local Rules for the United  
6 States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”) for  
7 entry of an order compelling PG&E Corporation and Pacific Gas & Electric Corporation  
8 (collectively, the “**PG&E**”) to produce PG&E’s (a) business plans; and (b) reports, studies,  
9 briefings, valuations, analyses and similar documents prepared by advisors, appraisers,  
10 investment bankers, consultants, lawyers, accountants, auditors, investigators, and professionals  
11 for the Company, or any of their respective boards or committees, during the applicable period,  
12 regarding the value of the Company or the safety of the Company’s transmission and distribution  
13 lines (collectively, “**Business Plans**”) requested under the TCC’s March 8, 2019 “Management  
14 Requests” No. 1 and No. 2, and this Court having jurisdiction to consider the Motion and the  
15 relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy*  
16 *Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Bankruptcy  
17 Local Rule 5011-1(a); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408  
18 and 1409; and the Court having found and determined that notice of the Motion as provided to the  
19 parties listed therein was reasonable and sufficient, and it appearing that no other or further notice  
20 needs to be provided; and this Court having reviewed the Motion; and this Court having held a  
21 hearing on the Motion; and the Court having determined that the legal and factual bases set forth  
22 in the Motion establish just cause for the relief sought therein; and it appearing that the relief  
23 requested in the Motion is in the best interest of the Debtors’ estates, creditors, shareholders, and  
24 all parties in interest; and upon all of the proceedings had before this Court and after due  
25 deliberation and sufficient cause appearing therefor,

26 **IT IS HEREBY ORDERED THAT:**

- 27 1. The Motion is granted as provided herein.

28 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.

3. Failure by the Debtors to do so shall result in the imposition of sanctions against PG&E, including PG&E being precluded from using any Business Plans not produced to the TCC by the date set forth above in any subsequent filing or hearing in or related to this Bankruptcy Case.

**\*\* END OF ORDER \*\***